

FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION
COMMISSION

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In the matter of:

Republican Party of Minnesota
Anthony G. Sutton, individually and
in his capacity as Treasurer

OFFICE OF GENERAL
COUNSEL
MUR No. 6521

COMPLAINT

1. Citizens for Responsibility and Ethics in Washington ("CREW") and Melanie Sloan bring this complaint before the Federal Election Commission ("FEC") seeking an immediate investigation and enforcement action against the Republican Party of Minnesota and Anthony G. Sutton, individually and as treasurer of the Republican Party of Minnesota, for direct and serious violations of the Federal Election Campaign Act ("FECA").

Complainants

2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and publicizes those who violate federal campaign finance laws through its website, press releases and other methods

of distribution. CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations of campaign finance law.

4. In order to assess whether an individual, candidate, political committee or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports that political committees must file pursuant to the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. CREW is hindered in its programmatic activity when an individual, candidate, political committee, or other regulated entity fails to disclose campaign finance information in reports of receipts and disbursements required by the FECA.

5. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated reports of receipts and disbursements are the only source of information CREW can use to determine if a candidate, political committee or other regulated entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all reports of receipts and disbursements required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.

6. Complainant Melanie Sloan is the executive director of Citizens for Responsibility and Ethics in Washington, a citizen of the United States, and a registered voter and resident of the District of Columbia. As a registered voter, Ms. Sloan is entitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Ms. Sloan is harmed when a candidate, political committee or

other regulated entity fails to report campaign finance activity as required by the FECA. *See FEC v. Akins*, 524 U.S. 11, 19 (1998), *quoting Buckley v. Valeo*, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Sloan is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting her ability to review campaign finance information.

Respondents

7. The Republican Party of Minnesota is a state committee within the meaning of 2 U.S.C. § 431(15).

8. Anthony G. Sutton was the treasurer of the Republican Party of Minnesota from May 14, 2007 through July 10, 2009 and the chairman of the Republican Party of Minnesota from July 1, 2009 through December 2, 2011.

Factual Allegations

9. On August 15, 2011, the FEC accepted a signed conciliation agreement with the Republican Party of Minnesota in Matter Under Review 5926 (attached as Exhibit 1). In that conciliation agreement, the Republican Party of Minnesota acknowledged that it had failed to disclose at least \$994,319 in outstanding debts to vendors during 2006 in violation of 2 U.S.C. § 434(b). Exhibit 1 at Section IV, ¶ 9. To resolve this violation of 2 U.S.C. § 434(b), the Republican Party of Minnesota agreed to pay a civil penalty of \$170,000. Exhibit 1 at Section VI. The Republican Party of Minnesota also expressly agreed to cease and desist from further violations of 2 U.S.C. § 434(b). Exhibit 1 at Section VII, ¶ 1.

10. On December 20, 2011, the Republican Party of Minnesota filed its December Monthly Report with the FEC (attached as Exhibit 2). The December Monthly Report indicates

that as of November 30, 2011 the Republican Party of Minnesota owed \$542,005.12 in debts and obligations. Exhibit 2 at 2, 130.

11. On December 30, 2011, the Republican Party of Minnesota held a news conference to announce that the party had conducted an internal financial review, revealing the party actually has approximately \$2,000,000 in debt, including \$415,211 in debts that have never been reported to the FEC. Baird Helgeson, State GOP \$2 million in debt, Minneapolis Star Tribune (December 30, 2011) (attached as Exhibit 3); Megan Boldt, Minnesota Republican Party debt could top \$2 million, St. Paul Pioneer Press (December 31, 2011) (attached as Exhibit 4).

12. The *Star-Tribune* reported, "The debt includes \$120,000 remaining on a \$170,000 fine levied by the Federal Election Commission from reporting discrepancies when [Anthony G.] Sutton was party treasurer. Republican executive committee members said they had been fighting with Sutton for months over the release of party financial information, and that they had not been able to get some of the documents they needed until after Sutton resigned. Before Sutton left, 'we knew we were being lied to,' said executive committee member Pat Anderson, former state auditor. *Sutton was 'running wild' with party finances and 'hiding bills not only from the executive committee, but regulatory agencies, even the treasurer.'*" Exhibit 3 (emphasis added).

COUNT I

13. FECA and FEC regulations require state committees, including the Republican Party of Minnesota, to disclose on their periodic reports to the FEC "the amount and nature of outstanding debts and obligations owed by" the state committee. 2 U.S.C. § 434(b)(8); 11 C.F.R. § 104.3(d). Moreover, FEC regulations require state committees to report debts and obligations that remain outstanding continuously until they are extinguished. 11 C.F.R. § 104.11(a). Debts

of \$500 or less must be reported not later than 60 days after the obligation is incurred. 11 C.F.R. § 104.11(b). Debts of more than \$500 must be reported as of the date the obligation is incurred.

Id.

14. The Republican Party of Minnesota and Anthony G. Sutton, as treasurer, knowingly and willingly violated the conciliation agreement in MUR 5926 by knowingly and willingly committing multiple violations of 2 U.S.C. § 434(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a)&(b) by repeatedly failing to disclose debts and obligations totaling at least \$415,211.

COUNT II

15. FECA and FEC regulations require the treasurer of a state committee to maintain records of all debts and obligations and to preserve those records for a period of not less than three years. 2 U.S.C. § 432(d); 11 C.F.R. §§ 102.9(c), 104.14(b)(1)-(3). Specifically, the treasurer of a state committee is required to "[m]aintain records, . . . including vouchers, worksheets, receipts, bills and accounts, which shall provide in sufficient detail the necessary information and data from which the filed reports . . . may be verified, explained, clarified, and check for accuracy and completeness." 11 C.F.R. § 104.14(b)(1). Knowingly and willfully filing a report with the FEC that is materially false, fictitious, or fraudulent is also prohibited by 18 U.S.C. § 1001.

16. Anthony G. Sutton, both as treasurer of the Republican Party of Minnesota and subsequently as chairman of the Republican Party of Minnesota, knowingly and willfully violated 2 U.S.C. § 432(d), 11 C.F.R. §§ 102.9(c), 104.14(1)-(3) and 18 U.S.C. § 1001 by failing to maintain records of the debts and obligations of the Republican Party of Minnesota and by filing materially false reports with the Federal Election Commission.

CONCLUSION

WHEREFORE, Citizens for Responsibility and Ethics in Washington and Melanie Sloan request that the Federal Election Commission conduct an investigation into these allegations, declare the respondents to have violated the Federal Election Campaign Act and applicable FEC regulations, impose sanctions, and take such further action as may be appropriate, including referring this case to the Department of Justice for criminal prosecution of any violations of 2 U.S.C. § 434(b) or 18 U.S.C. § 1001.

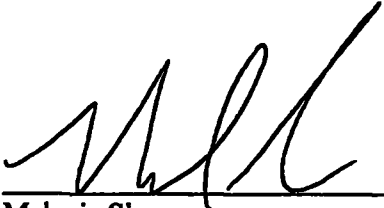


Melanie Sloan
Executive Director
Citizens for Responsibility and Ethics
in Washington
1400 Eye Street, N.W.
Suite 450
Washington, DC 20005
(202) 408-5565 (phone)
(202) 588-5020 (fax)

Verification

Citizens for Responsibility and Ethics in Washington and Melanie Sloan hereby verify
that the statements made in the attached Complaint are, upon information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.



Melanie Sloan

Sworn to and subscribed before me this 11th day of January, 2012.



Notary Public

Lisa Drew
District of Columbia, Notary Public
My Commission Expires
July 31, 2014



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EXHIBIT 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUG 17 2011

Michael E. Toner, Esq.
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006

RE: MUR 5926
Republican Party of Minnesota and
David E. Sturrock, in his official
capacity as treasurer
Marina Taubenberg

Dear Mr. Toner:

On August 15, 2011, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of your clients, the Republican Party of Minnesota and David E. Sturrock, in his official capacity as treasurer, in settlement of violations of 2 U.S.C. §§ 434(b) and 441a(f), and 11 C.F.R. §§ 102.5(a) and 106.7(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations. Additionally, on May 27, 2011, the Commission found that there is no reason to believe that Marina Taubenberg violated 2 U.S.C. § 434(b). Accordingly, the file has been closed in this matter.

Documents related to this case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the initial \$20,000 payment of the civil penalty is due within 30 days of the conciliation agreement's effective date. The Factual and Legal Analysis explaining the Commission's finding as to Marina Taubenberg is also enclosed.

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MUR 5926 (Republican Party of Minnesota)
Michael R. Tener, Esq.
Page 2

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Kasey S. Morgenheim

Kasey S. Morgenheim
Attorney

Enclosures
Conciliation Agreement
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

2011 AUG 12 PM 3:08

MUR 5926 OFFICE OF GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Republican Party of Minnesota and
David E. Sturrock, in his official
capacity as treasurer

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Citizens for Responsibility and Ethics in Washington ("CREW"), Melanie Sloan, and Diane Gerth, and pursuant to information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Republican Party of Minnesota ("RPM" or "Committee") and David E. Sturrock, in his official capacity as treasurer, (collectively, "Respondents") violated 2 U.S.C. §§ 434(b) and 441a(f), and 11 C.F.R. §§ 102.5(a) and 106.7(f).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.
- II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondents enter voluntarily into this agreement with the Commission.
- IV. The pertinent facts and law in this matter are as follows:

1. RPM is a political committee within the meaning of 2 U.S.C. § 431(4). RPM is a state committee of a political party within the meaning of 2 U.S.C. § 431(15).

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1 2. David E. Sturrock is the current treasurer of RPM. Mr. Sturrock was not the
2 treasurer when the conduct that gave rise to this matter occurred.

3 3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires
4 committees to disclose the nature and amount of outstanding debts and obligations in their
5 reports. See 2 U.S.C. § 434(b)(8).

6 4. Debts and obligations must be continuously reported until they are extinguished.
7 11 C.F.R. § 104.11(a). Debts of \$500 or less must be reported no later than 60 days after the
8 obligation is incurred, while debts of more than \$500 must be reported as of the date the
9 obligation is incurred. 11 C.F.R. § 104.11(b).

10 5. Section 104.11(b) of the Commission's regulations provides that regularly
11 recurring administrative expenses will be treated as debt when payment is due. If a committee
12 does not pay an employee for services rendered to the committee in accordance with an
13 employment contract or a formal or informal agreement to do so, the unpaid amount may be
14 treated as debt owed by the committee to the employee, or the employee can sign a written
15 agreement to convert his or her status to a volunteer. 11 C.F.R. § 100.74. If the unpaid amount
16 is treated as debt, the committee must continue to report the debt in accordance with 11 C.F.R.
17 §§ 104.3(d) and 104.11 until the debt is extinguished, until the Commission has completed a
18 review of a debt settlement plan pursuant to 11 C.F.R. § 116.7(f), or until the employee agrees to
19 become a volunteer, whichever occurs first. 11 C.F.R. § 116.6.

20 6. Between January 15, 2006 and May 31, 2006, or ten pay periods, RPM withheld
21 retirement contributions totaling \$7,623 from four employees. During this time period, RPM did
22 not make any payments to Ameriprise Financial Services ("AFS"), the vendor that maintained
23 RPM employees' retirement accounts.

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1 7. On June 6 and 16, 2006, RPM made two "catch up" payments to AFS totaling
2 \$12,243. Beginning June 30, 2006, all funds withheld by RPM were forwarded on a monthly
3 basis.

4 8. RPM failed to report \$7,623 in withheld employee retirement contributions as debt
5 without either a debt settlement plan or volunteer services agreement in violation of
6 2 U.S.C. § 434(b).

7 9. RPM failed to disclose at least \$994,319 in outstanding debt to vendors during
8 2006 in violation of 2 U.S.C. § 434(b). Of this total, RPM has not disclosed \$552,867 in debts
9 owed to four of its vendors during calendar year 2006, and RPM disclosed \$441,452 in May
10 2008 when it filed amendments to its 2006 disclosure reports. The majority of this \$441,452 in
11 additional debts was disclosed on multiple amended 2006 reports because they were repaid after
12 several reporting periods. The total of \$441,452 is the total of the increases in debt on each
13 report. The amended reports disclosed a total of \$83,277.49 in unique debt that had not been
14 disclosed on the original reports.

15 10. RPM also failed to report unreimbursed staff expense reports as outstanding debt
16 in violation of 2 U.S.C. § 434(b).

17 11. The Act provides that no person shall make contributions to a state party
18 committee's federal account in any calendar year which in the aggregate exceed \$10,000, and
19 prohibits the state committee from knowingly accepting such contributions. 2 U.S.C. § 441a(a)
20 and (f).

21 12. Under Minnesota campaign finance law, there is no contribution limit for
22 permissible sources giving to political parties. See Minnesota Statute Chapter 10A, Section 27.

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1 13. Where a committee has established both a federal and a non-federal account, only
2 funds subject to the limitations and prohibitions of the Act shall be deposited into such separate
3 federal account. 11 C.F.R. § 102.5(a)(1)(i).

4 14. A state party committee may transfer funds from its non-federal account to its
5 federal account solely to meet allocable expenses, such as administrative costs that are not
6 directly attributable to a clearly identified federal candidate. 11 C.F.R. § 106.7(f). Under this
7 provision, the committee must pay the entire amount of an allocable expense from its federal
8 account and transfer funds from its non-federal account to the federal account solely to cover the
9 non-federal share of that allocable expense. 11 C.F.R. § 106.7(f)(1)(i).

10 15. RPM incurred \$2,736,692 in administrative expenses during the 2006 election
11 cycle. The federal share of these expenses totaled \$574,342 and the non-federal share totaled
12 \$2,162,350. During this same time period, RPM made 51 transfers from its non-federal account
13 totaling \$2,723,202.

14 16. RPM made \$560,852 in excessive transfers from its non-federal account to its
15 federal account for allocated administrative expenses in violation of 2 U.S.C. § 441a(f) and
16 11 C.F.R. §§ 102.5(a) and 106.7(f).

17 17. RPM contends that the errors and omissions in its 2006-2008 reports were not
18 intentional and in 2007-2008 RPM acted proactively to address the issues involved by retaining
19 an accounting firm to conduct a comprehensive audit of its financial records. In 2008 RPM
20 further acted proactively to address the issues involved by filing more than 50 amendments to its
21 reports. However, these amendments did not disclose all previously undisclosed debt. RPM has
22 taken affirmative steps to ensure that such errors and omissions do not occur again by retaining a

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1 compliance company to prepare its reports, as well as federal campaign finance counsel that
2 serves as counsel to a number of Republican state party committees.

3 V. Respondents committed the following violations:

- 4 1. Respondents violated 2 U.S.C. § 434(b) by failing to report debts and obligations.
5 2. Respondents violated 2 U.S.C. § 441a(f) and 11 C.F.R. §§ 102.5(a) and 106.7(f) by
6 making excessive transfers from the Committee's non-federal account to its federal account for
7 allocated administrative expenses.

8 VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of
9 One Hundred and Seventy Thousand Dollars (\$170,000) pursuant to 2 U.S.C.

10 § 437g(a)(5)(A). The civil penalty will be paid as follows:

11 1. A payment of Twenty Thousand Dollars (\$20,000) is due no more than thirty (30)
12 days from the date this Agreement becomes effective;

13 2. Thereafter, ten consecutive monthly installment payments of Fifteen Thousand
14 Dollars (\$15,000) each;

15 3. Each such installment shall be paid within thirty (30) days of the due date of the
16 previous installment.

17 4. In the event that any installment payment is not received by the Commission by the
18 fifth day after which it becomes due, the Commission may, at its discretion, accelerate the
19 remaining payments and cause the entire amount to become due upon ten days written notice to
20 the Respondents. Failure by the Commission to accelerate the payments with regard to any
21 overdue installment shall not be construed as a waiver of its right to do so with regard to future
22 overdue installments.

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- 1 VII. 1. Respondents will cease and desist from violating 2 U.S.C. §§ 434(b) and 441a(f) and
2 11 C.F.R. §§ 102.5(a) and 106.7(f).
- 3 2. Respondents will take the following steps:
4
- 5 A. Require RPM personnel responsible for preparing RPM's reports and complying
6 with the Act and Commission regulations to attend a Commission-sponsored training program
7 during 2011-2012. Respondents shall submit to the Commission evidence of registration and
8 attendance at such event.
- 9 B. Prepare an internal training manual, prepared by experienced federal campaign
10 finance counsel, to assist appropriate personnel in understanding the reporting requirements of
11 the Act and Commission regulations. Within five months of the effective date of this
12 Agreement, Respondents shall submit to the Commission a copy of their internal training
13 manual.
- 14 C. Retain experienced federal campaign finance counsel to review RPM reports
15 before they are filed with the Commission.
- 16 VIII. Respondents will amend the relevant 2006 disclosure reports to accurately reflect debts and
17 obligations referenced at paragraphs IV.8 and IV.9 within 60 days.
- 18 IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1)
19 concerning the matters at issue herein or on its own motion, may review compliance with
20 this agreement. If the Commission believes that this agreement or any requirement thereof
21 has been violated, it may institute a civil action for relief in the United States District Court
22 for the District of Columbia.
- 23 X. This agreement shall become effective as of the date that all parties hereto have executed
24 same and the Commission has approved the entire agreement.

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- 1 XI. Respondents shall have no more than 30 days from the date this agreement becomes
2 effective, unless otherwise specified, to comply with and implement the requirements
3 contained in this agreement and to so notify the Commission.
4 XII. This Conciliation Agreement constitutes the entire agreement between the parties on the
5 matters raised herein, and no other statement, promise, or agreement, either written or oral,
6 made by either party or by agents of either party, that is not contained in this written
7 agreement shall be enforceable.

8 FOR THE COMMISSION:

9 Christopher Hughey
10 Acting General Counsel

11
12
13 BY:

14 Kathleen M. Guth
15 Kathleen M. Guth
16 Acting Associate General Counsel for Enforcement
17

18
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23
24
Date 5/16/11

18 FOR THE RESPONDENTS:

19
20 Michael E. Toner
21 Michael E. Toner
22 Counsel
23 Republican Party of Minnesota
24

Date 7/28/11

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EXHIBIT 2

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Image# 11972768558

**FEC
FORM 3X****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M5

Republican Party of Minnesota

ADDRESS (number and street)

525 Park Street

Suite 250

☐ Check if different
than previously
reported. (ACC)

Saint Paul

MN

55103-2145

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

☒ C000013133. IS THIS
REPORT☒ NEW

(N)

OR

☐ AMENDED

(A)

4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

- ☐ April 15
Quarterly Report (Q1)
- ☐ July 15
Quarterly Report (Q2)
- ☐ October 15
Quarterly Report (Q3)
- ☐ January 31
Year-End Report (YE)
- ☐ July 31 Mid-Year
Report (Non-election
Year Only) (MY)
- ☐ Termination Report
(TER)

(b) Monthly
Report
Due On:☐ Feb 20 (M2)☐ May 20 (M5)☐ Aug 20 (M8)☐ Nov 20 (M11)
(Non-Election
Year Only)☐ Mar 20 (M3)☐ Jun 20 (M6)☐ Sep 20 (M9)☒ Dec 20 (M12)
(Non-Election
Year Only)☐ Apr 20 (M4)☐ Jul 20 (M7)☐ Oct 20 (M10)☐ Jan 31 (YE)(c) 12-Day
PRE-Election
Report for the:☒ Primary (12P)☐ General (12G)☐ Runoff (12R)☐ Convention (12C)☐ Special (12S)

Election on

In the
State of(d) 30-Day
POST-Election
Report for the:☐ General (30G)☐ Runoff (30R)☐ Special (30S)

Election on

In the
State of

5. Covering Period

11

01

2011

through

11

30

2011

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer David Sturrock

Signature of Treasurer

David Sturrock

[Electronically Filed]

Date

12

20

2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
Only**FEC FORM 3X**
Rev. 12/2004

FEBAND29

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

Republican Party of Minnesota

Report Covering the Period:

From:

11 01 2011

To:

11 30 2011

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2011		-31277.68
(b) Cash on Hand at Beginning of Reporting Period.....	-120770.55	
(c) Total Receipts (from Line 19)	169880.42	2041013.85
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	49109.87	2009735.89
7. Total Disbursements (from Line 31)	132188.59	2092794.71
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	-83058.72	-83058.72
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	542005.12	

☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Republican Party of Minnesota

Report Covering the Period:

From:

11

01

2011

To:

11

30

2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	87041	748020.9
(ii) Unitemized.....	61616.43	662588.45
(ii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	148657.43	1711609.35
(b) Political Party Committees.....	0	0
(c) Other Political Committees (such as PACs).....	15000	48290.72
(d) Total Contributions (add Lines 11(a)(ii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	163657.43	1760870.07
12. Transfers From Affiliated/Other Party Committees.....	0	17000
13. All Loans Received.....	0	0
14. Loan Repayments Received.....	0	0
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	3822.99	15346.07
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0	0
17. Other Federal Receipts (Dividends, Interest, etc.).....	0	5187.43
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	2600	242690.08
(b) Levin Funds (from Schedule H5).....	0	0
(c) Total Transfers (add 18(a) and 18(b))..	2600	242690.08
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	169880.42	2041013.65
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	167280.42	1798323.57

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	8855.88	239476.78
(ii) Non-Federal Share	15388.4	425738.49
(b) Other Federal Operating Expenditures	42772.83	528944.27
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	66817.21	1195157.54
22. Transfers to Affiliated/Other Party Committees	0	0
23. Contributions to Federal Candidates/Committees and Other Political Committees	0	0
24. Independent Expenditures (use Schedule E)	0	0
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F)	0	0
26. Loan Repayments Made	0	31804.58
27. Loans Made	0	0
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	485	35889.8
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs)	0	5000
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))	485	40889.8
29. Other Disbursements	0	2150
30. Federal Election Activity (2 U.S.C. §431(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0	0
(ii) "Levin" Share	0	0
(b) Federal Election Activity Paid Entirely With Federal Funds	64886.38	822882.89
(c) Total Federal Election Activity (add .. Lines 30(a)(i), 30(a)(ii) and 30(b))	64886.38	822882.89
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	132168.59	2092794.71
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)	116780.19	1667058.22

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Ex- **pensitures**

COLUMN A **Total This Period**

COLUMN B **Calendar Year-to-Date**

33. Total Contributions (other than loans)
(from Line 11(d), page 3)
34. Total Contribution Refunds
(from Line 28(d))
35. Net Contributions (other than loans)
(subtract Line 34 from Line 33)
36. Total Federal Operating Expenditures
(add Line 21(a)(i) and Line 21(b))
37. Offsets to Operating Expenditures
(from Line 15, page 3)
38. Net Operating Expenditures
(subtract Line 37 from Line 36)

163857.43

485

163182.43

51428.81

3622.99

47805.82

1760870.07

40889.8

1719970.47

769421.05

15348.07

754074.98

SCHEDULE D (FEC Form 3X)**DEBTS AND OBLIGATIONS**

Excluding Loans

(Use separate
schedule(s)
for each
numbered line)

PAGE 121 OF 137

FOR LINE NUMBER:
(check only one)☐ 9
☒ 10

NAME OF COMMITTEE (In Full)

Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

David Sturrock

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Travel

Mailing Address 1142 David Drive

City State

Marshall

Zip Code

MN

56258-3406

Outstanding Balance Beginning This Period

0

Transaction ID : SD10-DEBT86854

Amount Incurred This Period

58.34

Payment This Period

0

Outstanding Balance at Close of This Period

58.34

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Radisson St. Cloud

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Facility
Rental/Non Candidate

Mailing Address 404 W Saint Germain Street

City State

Saint Cloud

Zip Code

MN

56301-3612

Outstanding Balance Beginning This Period

1036.82

Transaction ID : SD10-DEBT845317

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

1036.82

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Resolution Graphics

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Party Printing

Mailing Address 3725 Dunlap Street N

City

Saint Paul

State

MN

Zip Code

55112-6968

Outstanding Balance Beginning This Period

0

Transaction ID : SD10-DEBT86858

Amount Incurred This Period

5054.08

Payment This Period

0

Outstanding Balance at Close of This Period

5054.08

1) SUBTOTALS This Period This Page (optional).....▶

6149.04

2) TOTALS This Period (last page this line number only).....▶

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....▶

182779.22

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)▶

182778.22

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate
 schedule(s)
 for each
 numbered line)

PAGE 122 OF 137

FOR LINE NUMBER:
 (check only one)

☐ 9
☒ 10

NAME OF COMMITTEE (In Full)
Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

SMD Copy Systems

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Equipment MaintenanceMailing Address **6520 W Lake Street**City **Minneapolis**

State

Zip Code

MN**55426-4205**

Outstanding Balance Beginning This Period

0Transaction ID : **SD10-DEBT868659**

Amount Incurred This Period

209.97

Payment This Period

0

Outstanding Balance at Close of This Period

209.97

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

AVR Inc.

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Party Sound and Light RentalMailing Address **3994 Cedarville Dr**City **Eagan**

State

Zip Code

MN**55122**

Outstanding Balance Beginning This Period

17787.44Transaction ID : **SD10-DEBT844037**

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

17787.44

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

A. J. Schaake Co

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Name PlateMailing Address **919 Saint Clair Avenue**City **Saint Paul**

State

Zip Code

MN**55105-3211**

Outstanding Balance Beginning This Period

0Transaction ID : **SD10-DEBT868650**

Amount Incurred This Period

66.73

Payment This Period

0

Outstanding Balance at Close of This Period

66.73

1) SUBTOTALS This Period This Page (optional).....▶

18084.14

2) TOTALS This Period (last page this line number only).....▶

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....▶

182779.22

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)▶

182779.22

SCHEDULE D (FEC Form 3X)**DEBTS AND OBLIGATIONS**

Excluding Loans

(Use separate
schedule(s)
for each
numbered line)

PAGE 123 OF 137

FOR LINE NUMBER:
(check only one)
☐ 9
☒ 10

NAME OF COMMITTEE (In Full)

Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Hub Properties Trust

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Office Rent

Mailing Address Rel Management Research
330 2nd. Ave. S Suite 110City State Zip Code
Minneapolis MN 55401

Outstanding Balance Beginning This Period

17

Transaction ID : SD10-DEBT846088

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

17

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

FLS Connect

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Party
Fundraising TelemarketingMailing Address 7300 Hudson Boulevard N
Suite 270City State Zip Code
Saint Paul MN 55128-7143

Outstanding Balance Beginning This Period

71198.94

Transaction ID : SD10-DEBT843655

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

71198.94

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Pinnacle Direct, Inc.

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Party
Fundraising Mail/Non-Candidate

Mailing Address 15260 113th Street N

City State Zip Code
Stillwater MN 55082-9575

Outstanding Balance Beginning This Period

14401.98

Transaction ID : SD10-DEBT846311

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

14401.98

1) SUBTOTALS This Period This Page (optional).....▶

85617.80

2) TOTALS This Period (last page this line number only).....▶

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....▶

182779.22

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)▶

182779.22

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate
 schedule(s)
 for each
 numbered line)

PAGE 124 OF 137

FOR LINE NUMBER:
 (check only one)

☐ 9
☒ 10

NAME OF COMMITTEE (in Full)
 Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

All American Self Storage

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Storage

Mailing Address 1500 Marshall Avenue

City State

Zip Code

Saint Paul

MN

55104-8317

Outstanding Balance Beginning This Period

0

Transaction ID : SD10-DEBT868651

Amount Incurred This Period

148

Payment This Period

0

Outstanding Balance at Close of This Period

148

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Tarrance Group

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Party Polling

Mailing Address 201 N Union Street

Suite 410

City State

Zip Code

Alexandria

VA

22314-2849

Outstanding Balance Beginning This Period

28127

Transaction ID : SD10-DEBT839632

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

28127

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Minnesota Dept of Health

Nature of Debt (Purpose):

Administrative/Salary/Overhead: List Enhancement

Mailing Address PO Box 64882

City

State

Zip Code

Saint Paul

MN

55184-0882

Outstanding Balance Beginning This Period

0

Transaction ID : SD10-DEBT868658

Amount Incurred This Period

15

Payment This Period

0

Outstanding Balance at Close of This Period

15

1) SUBTOTALS This Period This Page (optional).....▶

26290.00

2) TOTALS This Period (last page this line number only).....▶

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....▶

182779.22

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)▶

182778.22

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate
 schedule(s)
 for each
 numbered line)

PAGE 125 OF 137

FOR LINE NUMBER:
 (check only one)

☐ 9
☒ 10

NAME OF COMMITTEE (In Full)
Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Cardinals FEC Compliance Services

Nature of Debt (Purpose):

**Administrative/Salary/Overhead: FEC
 Compliance Services/Accounting**

Mailing Address **791 Holly Avenue
 Suite 300**

City State Zip Code
Saint Paul MN 55104-7135

Outstanding Balance Beginning This Period

42815.4

Transaction ID : **SD10-DEBT865255**

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

42815.4

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Bryan Cave LLP

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Legal Fees

Mailing Address **700 13th Street NW**

City State Zip Code
Washington DC 20005-3980

Outstanding Balance Beginning This Period

52830.3

Transaction ID : **SD10-DEBT845289**

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

52830.3

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Pinnacle List Company

Nature of Debt (Purpose):

**Administrative/Salary/Overhead: Generic Party
 Printing**

Mailing Address **2800 S Shirlington Road
 Suite 401**

City State Zip Code
Arlington VA 22206-3608

Outstanding Balance Beginning This Period

4238.37

Transaction ID : **SD10-DEBT831921**

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

4238.37

1) SUBTOTALS This Period This Page (optional)..... ►

100082.07

2) TOTALS This Period (last page this line number only)..... ►

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)..... ►

182779.22

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ►

182779.22

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate
 schedule(s)
 for each
 numbered line)

PAGE 128 OF 137

FOR LINE NUMBER:
 (check only one)

☐ 9
☒ 10

NAME OF COMMITTEE (In Full)
Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Cardmember Services

Nature of Debt (Purpose):

**Administrative/Salary/Overhead: SEE BELOW:
 CC Payment**

Mailing Address **PO Box 790408**

City State
Saint Louis

Zip Code
MO 63179-0408

Outstanding Balance Beginning This Period

25489.87

Transaction ID : **SD10-DEBT867633**

Amount Incurred This Period

0

Payment This Period

1016

Outstanding Balance at Close of This Period

24453.87

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Popp.com

Nature of Debt (Purpose):

**Administrative/Salary/Overhead: Party
 Telephone Service**

Mailing Address **PO Box 27110**

City State
Minneapolis

Zip Code
MN 55427-0110

Outstanding Balance Beginning This Period

0

Transaction ID : **SD10-DEBT868657**

Amount Incurred This Period

3805.87

Payment This Period

0

Outstanding Balance at Close of This Period

3805.87

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Strother Communications Group

Nature of Debt (Purpose):

**Administrative/Salary/Overhead: Party
 Consultant-Communications**

Mailing Address **222 S 9th Street
 Floor 41**

City
Minneapolis

State Zip Code
MN 55402-3389

Outstanding Balance Beginning This Period

31496.68

Transaction ID : **SD10-DEBT844245**

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

31496.68

- 1) SUBTOTALS This Period This Page (optional)..... ►
- 2) TOTALS This Period (last page this line number only)..... ►
- 3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)..... ►
- 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ►

59758.20

182779.22

182779.22

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate
schedule(s)
for each
numbered line)

PAGE 127 OF 137

FOR LINE NUMBER:
(check only one)

☐ 9
☒ 10

NAME OF COMMITTEE (In Full)
Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Civis Communications

Nature of Debt (Purpose):

**Administrative/Salary/Overhead: Blackberry
 Rental Fee**

Mailing Address **2 Carlson Parkway N
 Suite 375**

City State Zip Code
Plymouth MN 55447-4446

Outstanding Balance Beginning This Period

841.94

Transaction ID : **SD10-DEBT846440**

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

841.94

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

RBA Consulting

Nature of Debt (Purpose):

**Administrative/Salary/Overhead: Party
 Software Consulting**

Mailing Address **445 Lake Street E
 Suite 120**

City State Zip Code
Wayzata MN 55391-1670

Outstanding Balance Beginning This Period

4775

Transaction ID : **SD10-DEBT843637**

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

4775

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Amato & Associates, llc

Nature of Debt (Purpose):

**Administrative/Salary/Overhead: Party IT/Web
 Services**

Mailing Address **PO Box 678**

City State Zip Code
Hopkins MN 55343-0678

Outstanding Balance Beginning This Period

3007.5

Transaction ID : **SD10-DEBT840867**

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

3007.5

1) SUBTOTALS This Period This Page (optional).....▶

8624.44

2) TOTALS This Period (last page this line number only).....▶

182779.22

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....▶

182779.22

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)▶

110444370877

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate
 schedule(s)
 for each
 numbered line)

PAGE 128 OF 137

FOR LINE NUMBER:
 (check only one)

☐ 9
☒ 10

NAME OF COMMITTEE (In Full)
 Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Ameriprise Financial Services, Inc.

Nature of Debt (Purpose):

Administrative/Salary/Overhead: FEA
 Employees IRA Contribution

Mailing Address 70205 Ameriprise Financial Center

City State

Minneapolis

Zip Code

MN

55474-0702

Outstanding Balance Beginning This Period

7638.64

Transaction ID : SD10-DEBT850228

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

7638.64

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Staples Business Advantage

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Party Office
 Supplies

Mailing Address PO Box 83889

City State

Chicago

Zip Code

IL

60698-0001

Outstanding Balance Beginning This Period

0

Transaction ID : SD10-DEBT868680

Amount Incurred This Period

831.95

Payment This Period

0

Outstanding Balance at Close of This Period

831.95

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Business Data Records

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Business
 Data Storage

Mailing Address 201 9th Avenue SW

City

Saint Paul

State

MN

Zip Code

55112-3211

Outstanding Balance Beginning This Period

0

Transaction ID : SD10-DEBT868652

Amount Incurred This Period

258.88

Payment This Period

0

Outstanding Balance at Close of This Period

258.88

1) SUBTOTALS This Period This Page (optional).....▶

2) TOTALS This Period (last page this line number only).....▶

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....▶

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)▶

8825.47

182779.22

182779.22

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
 Excluding Loans

(Use separate
 schedule(s)
 for each
 numbered line)

PAGE 129 OF 137

FOR LINE NUMBER:
 (check only one)

☐ 9
☒ 10

NAME OF COMMITTEE (In Full)
 Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor
 Coffee Mill, Inc.

Nature of Debt (Purpose):
 Administrative/Salary/Overhead: Water Cooler
 Rental

Mailing Address 9200 Wyoming Ave North
 Suite 300

City State Zip Code
 Brooklyn Park MN 55445-1845

Outstanding Balance Beginning This Period

0

Transaction ID : SD10-DEBT868653

Amount Incurred This Period

46.29

Payment This Period

0

Outstanding Balance at Close of This Period

46.29

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor
 Trimble & Associates

Nature of Debt (Purpose):
 Administrative/Salary/Overhead: Legal Fees

Mailing Address 10210 WAYZATA BLVD
 SUITE 130

City State Zip Code
 Hopkins MN 55305

Outstanding Balance Beginning This Period

30659.85

Transaction ID : SD10-DEBT846320

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

30659.85

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor
 C. Forbes, Inc.

Nature of Debt (Purpose):
 Administrative/Salary/Overhead: Legal Fees

Mailing Address 12830 West Creek Parkway
 Suite G

City State Zip Code
 Richmond VA 23238-1126

Outstanding Balance Beginning This Period

1068.3

Transaction ID : SD10-DEBT828774

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

1068.3

1) SUBTOTALS This Period This Page (optional).....▶

31772.24

2) TOTALS This Period (last page this line number only).....▶

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....▶

182779.22

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)▶

182779.22

SCHEDULE D (FEC Form 3X)**DEBTS AND OBLIGATIONS**

Excluding Loans

(Use separate
schedule(s)
for each
numbered line)

PAGE 130 OF 137

FOR LINE NUMBER:
(check only one)☐ 9
☒ 10

NAME OF COMMITTEE (in Full)

Republican Party of Minnesota

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Direct Mail Systems

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Party Direct
Mailing

Mailing Address 12450 Automobile Boulevard

City State

Zip Code

Clearwater

FL

33762-4427

Outstanding Balance Beginning This Period

0

Transaction ID : SD10-DEBT968655

Amount Incurred This Period

13544.4

Payment This Period

0

Outstanding Balance at Close of This Period

13544.4

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Targeted Victory

Nature of Debt (Purpose):

Administrative/Salary/Overhead: Fundraising
Fees

Mailing Address 66 Canal Center Plaza

Suite 501

City State

Zip Code

Alexandria

VA

22314-1576

Outstanding Balance Beginning This Period

500

Transaction ID : SD10-DEBT844254

Amount Incurred This Period

0

Payment This Period

0

Outstanding Balance at Close of This Period

500

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor

Nature of Debt (Purpose):

Mailing Address

City

State

Zip Code

Outstanding Balance Beginning This Period

Amount Incurred This Period

Payment This Period

Outstanding Balance at Close of This Period

1) SUBTOTALS This Period This Page (optional).....▶

14044.40

2) TOTALS This Period (last page this line number only).....▶

359225.80

3) TOTAL OUTSTANDING LOANS from Schedule C (last page only).....▶

182779.22

4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)▶

542005.12

110474708880

StarTribune

State GOP \$2 million in debt

Article by: DAIRD HELGESON
Star Tribune
December 30, 2011 - 11:17 PM

The Republican Party of Minnesota is \$2 million in debt heading into an expensive election year, including more than \$700,000 owed to lawyers in last year's gubernatorial recount.

GOP officials released the new financial information Friday, disclosing previously unreported debts, credit card bills, and fees from the recount far greater than anyone expected.

Party leaders decided to release the report, including what they called "ugly" information, in an effort to rebuild trust among voters, activists and contributors. The new information showed a party burning through cash far faster than it was taking it in as the former chairman did not disclose mountains of debt to party leaders.

Republicans said that they found no immediate evidence of criminal wrongdoing, but that they could not rule it out. "The people in the Republican Party need to know where we stand, warts and all," said Jeff Johnson, a Republican National Committee member who led the review of party finances. "There are some warts in here."

Also Friday, the party's secretary-treasurer, David Sturrock, resigned, saying in a letter to activists that the party needs someone in that position who does not live 160 miles from party headquarters and who has "significant financial management experience."

Sturrock also said secretary-treasurers "need to be informed more fully. ... I was neither consulted nor informed about ... 2010 recount costs. Also, the unreported obligations identified by the current financial review were not known to me."

It was another in a series of resignations by party leaders. Former chairman Tony Sutton resigned early this month amid mounting pressure about party finances. He would not comment in detail Friday, but released a statement saying he doesn't regret spending money to win control of the Legislature for the first time in 40 years.

Businessman Mike Velich, who helped the GOP dig through expenses, said they discovered \$415,211 in debt that had never been reported. In addition, the party owes \$100,000 in refunds to contributors and in checks that had been reported as paid but had not been sent to vendors.

Velich and Johnson also discovered \$18,000 in credit card debt and \$200,000 in bank lines of credit that are tapped out. They are still trying to learn more details about the credit card exposures.

The GOP owes money to more than 60 entities, including thousands of dollars to local political consultants, its health insurance provider and even \$797 to Kieran's Irish Pub.

All told, the party owes \$1.28 million, records show. That doesn't include \$717,000 in unpaid legal fees amassed during the gubernatorial recount between Republican Tom Emmer and Democrat Mark Dayton. Party officials say it remains unclear whether they are legally obligated to pay the recount debt, but lawyers who represented Emmer and the GOP insist the party is liable for the bills.

The latest financial information does not include a request to repay a \$75,000 contribution by Tom Petters, imprisoned on a conviction of orchestrating a \$3.65 billion Ponzi-type scheme. Those representing Petters' receivership are asking that the money be returned.

Republicans released the information a day before party activists meet Saturday to select a new party chairman, who will have to pivot and focus on digging the party out of debt. The activists will convene in St. Cloud to elect the chairman and settle on a path forward, which could include a more detailed, forensic audit of party finances.

State GOP leaders are already working with federal election officials to correct campaign finance reports dating to 2009, which could result in steep fines.

The mounting financial pressures mean the party must find a way to wage campaign to hold control of the Legislature, defeat President Obama and find a credible candidate to challenge Democratic U.S. Sen. Amy Klobuchar.

"We are committed to ensuring that the Republican Party of Minnesota is accountable for its actions and is more transparent with its information," said Kelly Fenton, deputy party chairwoman.

Johnson would not say whether he thought Sutton, unanimously re-elected GOP chairman a year ago, had misled party officials about the GOP's financial health. "I am not going to go there," he said.

The debt includes \$120,000 remaining on a \$170,000 fine levied by the Federal Election Commission from reporting discrepancies when Sutton was party treasurer.

Republican executive committee members said they had been fighting with Sutton for months over the release of party financial information. They said they were not able to get some documents they needed until after Sutton resigned.



Jeff Johnson of the Republican National Committee spoke at a Friday news conference alongside Mike Velich and Kelly Fenton.

Before Sutton left, "we know we were being lied to," said executive committee member Pat Anderson, former state auditor. Sutton was "running wild" with party finances and "hiding bills not only from the executive committee, but regulatory agencies, even the treasurer." Sutton said he would not respond to Anderson's allegations.

Johnson said he expects that everyone owed money by the GOP will eventually be paid, but he couldn't say when.

The new finance revelations cap what has been one of the most traumatic months in the history of the state GOP. Soon after Sutton left, Senate Majority Leader Amy Koch resigned her leadership post after admitting she had an improper relationship with a Senate staffer.

Republicans are not the only ones facing debt. The DFL Party started the year with about \$725,000 in red ink. DFL Chair Kew Martin said the party has paid down more than \$500,000. "I anticipate that we will be completely out of debt by the middle of next year, for sure by the end of 2012," he said.

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EXHIBIT 4

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Minnesota Republican Party debt could top \$2 million

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The Minnesota Republican Party's debts total about \$2 million, including more than \$700,000 in contested legal fees from the 2010 gubernatorial recount.

The party's financial troubles were no secret, but an internal review released Friday detailed the extent of the problems. It shows the party has obligations totaling \$1.3 million over and above the legal fees, including \$415,000 that hadn't been reported before and \$120,000 in Federal Election Commission fines.

"The debt number is higher than anyone wants it to be," said Jeff Johnson, chairman of the party's executive committee and a Hennepin County commissioner. "There's some pretty ugly stuff in here."

Later Friday, party secretary-treasurer David Sturrock resigned, saying he needed to step aside to allow new leadership to make a fresh start.

Meanwhile, party leaders said they're working with election officials to correct campaign finance reports dating back to 2009, which could result in fines at the state and federal levels.

"Our intent is we're going to fix whatever we need to fix," Johnson said.

The financial news came on the eve of today's election of a Republican Party chairman. Party activists are in St. Cloud to pick a successor to former Chairman Tony Sutton, who quit Dec. 2 amid complaints of the escalating debt.

And it comes as Republicans try to regain majorities in the state House and Senate and unseat Democratic U.S. Sen. Amy Klobuchar next year.

The party brought in

accountant Mike Vekich to review its finances. An audit would have taken months to complete, he said, and party leaders wanted the numbers released before today's chairmanship election.

"We are committed to making sure that the Republican Party of Minnesota is accountable for its actions and is more transparent with its information," acting chairwoman Kelly Fanton said.

The analysis also found about \$18,000 in credit card debt incurred when Ron Carey chaired the party and \$200,000 taken out from lines of credit.

The findings did not include a request for the party to return a \$75,000 contribution from Tom Petters, who is serving a 50-year prison sentence for running a \$3.5 billion Ponzi scheme.

The \$719,000 in legal fees are from the recount in the 2010 gubernatorial election, which Republican Tom Emmer ultimately conceded to Democrat Mark Dayton.

Republican leaders say a separate entity created to fund the recount is responsible for the bills, but at least one of the recount attorneys told the Associated Press the party was the client.

It's unclear exactly how much the state GOP plans to spend next year. According to FEC filings, the party had spent about \$2.3 million as of Nov. 30 for the 2011-12 election cycle. It spent about \$9.5 million in 2009-10.

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Vekich said paying off the debt is possible.

Sutton defended his actions Friday, releasing a statement that said the debt reflects a hard-fought election during a difficult fundraising time.

"The legislative majorities won in 2010 were worth it, and the people of this state are better off for those GOP majorities," Sutton said.

Friday's confirmation of the party's financial straits was another setback in a turbulent month for the state GOP.

Two weeks ago, Senate Majority Leader Amy Koch of Buffalo resigned. The next day, it was revealed that she had had an inappropriate relationship with a Senate staffer. That same day, the Senate GOP's head spokesman, Michael Broskorb, lost his job. He had been the state party's deputy chairman until October under Sutton.

In his resignation letter as secretary-treasurer, Sturrock said the GOP's new leaders need to "regain the confidence of activists, donors and voters in our ability to manage party finances."

He also said his successor must be better informed about the party's major financial commitments. For example, he said, he wasn't told about the attorney costs associated with the recount and didn't know about the \$415,000 in unreported obligations found in the financial review.

Vying today for party chairman are:

- Terry McCall, who chairs the 2nd Congressional District's Republicans.
- Longtime political operative Pat Shorridge.
- Commercial real estate broker Todd McIntyre.

Messages left for all three candidates were not immediately returned Friday.

It's not uncommon for parties to emerge in debt from an election year like 2010, said Alan Weinblatt, an attorney who has represented and advised Democrats on campaign finance issues for almost four decades.

But to have that debt lingering a year later - and of that magnitude - is unusual, he said.

"The dollar amount is quite large, and it doesn't seem to be going down," Weinblatt said.

The Minnesota DFL Party, for example, started this year \$725,000 in debt, the largest in the party's history, said party Chairman Ken Martin. Some of it was from last year's election, but some of the debt had accumulated from several election cycles.

Martin said the party came up with an aggressive fundraising plan and has paid off about \$500,000.

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